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7 Attorney for Debtors
8 PATRICIA MAULDIN

9 UNITED STATES BANKRUPTCY COURT

10 NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

11 In re:

12 PATRICIA MAULDIN,

13 Debtors.

CHAPTER 13

Bankruptcy Case No. 11-31183 SFM

Hearing Date:

Judge: Montalli

**Place: Courtroom 22-235 Pine
Street, San Francisco, CA 94104**

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15 RESPONSE TO TRUSTEE'S MOTION TO DISMISS CASE PRIOR TO CONFIRMATION

16 Debtor responds to the motion to dismiss as follows:

- 17 1. The debtor opposes the motion to dismiss averring that no cause exists for dismissal.

18 The debtor has actively and aggressively been pursuing confirmation. The new
19 procedure regarding dismissal was meant to ensure that the bar generally would
20 prosecute cases. The new procedure was not meant to punish debtors who are actively
21 prosecuting their cases. Here, the debtor has been actively prosecuting her case in light
22 and actively taking steps to resolve issues so that the case can be confirmed.

23 Additionally, due to debtor's disabilities and issues that have been outside of her
24 control, she has required additional time to address the concerns of the trustee and her
25 creditors.
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2. The trustee's motion to dismiss is based on several items which the debtor's attorney believes have been resolved by filing amended schedules and an amended Chapter 13 Plan.

3. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on October 27, 2011, at San Jose, California.

Dated: October 27, 2011

STEBURG LAW FIRM

/s/ Anita L. Steburg
Anita L. Steburg
Counsel for Debtor